

K&L GATES

December 27, 2024

By Email

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

On behalf of Defendant Vadim Wolfson, I write with the government's consent to request that Mr. Wolfson's deadline for submitting a reply brief to the government's omnibus filing (ECF No. 93) be extended from January 6, 2024, to January 13, 2024. Co-defendant Gannon Bond has already requested and received an extension to January 13, 2024. *See* ECF No. 95. Granting Mr. Wolfson the same extension will create a uniform filing deadline. As further good cause, Mr. Wolfson requests the extension given the holidays in between the government's omnibus filing and the present January 6 deadline, and also given the need to evaluate complex technical arguments that the government has made for the first time in Exhibits Q and R of its filing.

Respectfully submitted,

/s/ David Rybicki
David Rybicki

Counsel for Vadim Wolfson